

**United States District Court**DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

STEVEN C. MORELLO

**CRIMINAL COMPLAINT**CASE NUMBER: 04- M00083-LPC

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about October 15, 2004 in Essex County, in the \_\_\_\_\_ District of Massachusetts defendant, (Check Statutory Language of Offense)

By force and intimidation, took from the person and presence of employees of Eastern Bank, money belonging to and in the custody, control, management, and possession of Eastern Bank, a federally insured financial institution,

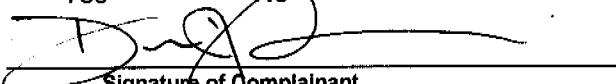
in violation of Title 18, United States Code, Section(s) 2113(a).

I further state that I am a(n) Special Agent, Federal Bureau of Investigation and that this complaint is based on the following facts:

Official Title

**See Attached Affidavit**

Continued on the attached sheet and made a part hereof:

 Yes No


Signature of Complainant

David C. Johnson

Special Agent, Federal Bureau of Investigation  
United States Department of Justice

December 2, 2004 at Boston, Massachusetts  
Date City and State

Honorable Lawrence P. Cohen, United States Magistrate Judge  
Name & Title of Judicial Officer



Signature of Judicial Officer

AFFIDAVIT

I, David C. Johnson, having been duly sworn, do hereby depose and say:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed for two and a half years. Previously, I was a Special Agent employed with the United States Naval Criminal Investigative Service (NCIS) for four years. I have been involved in numerous investigations involving bank robberies, armored car robberies, health care fraud, money laundering, narcotics, and violent crimes. I have been assigned to the Boston Division of the FBI for over two and a half years and am currently assigned to the Bank Robbery Task Force (the "task force"), which is comprised of personnel from the FBI, the Massachusetts State Police, and the Boston, Malden and Cambridge Police Departments.

2. I am aware that Title 18 of the United States Code, Section 2113(a), makes it a crime for anyone to use force and violence, or intimidation, to take money belonging to or in the care, custody, control, management, possession of any federally insured bank. Having so said, I make this affidavit in support of a criminal complaint charging Steven C. Morello with the robbery of the Eastern Bank located at 13 Main Street in Saugus, Massachusetts at approximately 2:30 p.m. on October 15, 2004.

3. The facts stated herein are based upon my own personal involvement in this investigation, and my discussions with other law enforcement officers also involved with this investigation.

4. As part of the investigation into several area bank robberies, the following facts were discovered which lead to the development of Steven C. Morello as the subject of the bank robbery of the Eastern Bank at 13 Main St. in Saugus, Massachusetts:

- a. On August 31, 2004, the East Boston Savings Bank located at 856 Bennington St., East Boston, Massachusetts, was robbed of approximately \$1,382 in U.S. Currency.
- b. Also on August 31, 2004, the Boston Federal Savings Bank located at 457 Broadway, Chelsea, Massachusetts, was robbed of approximately \$1,000 in U.S. Currency.
- c. Investigation by the Boston Police indicated Morello was the subject of the East Boston robbery based on photographic recognition by Boston Police officers. Analysis and comparison of surveillance photographs of the subject in the Chelsea robbery and known images of Morello indicated Morello was the subject responsible for this robbery as well.
- d. Both Police Departments applied for and obtained local arrest warrants for Morello, although police were unable to locate him at that time.

5. On October 15, 2004, the Eastern Bank, located at 13 Main Street in Saugus, Massachusetts was robbed of approximately \$5,422 in U.S. Currency by a lone white male (later determined to be Morello). In an interview after the robbery, the victim teller, Arline L. McNulty, reported that a white male approached her teller window and gave a verbal demand for money. McNulty reported the subject stated, "Give me \$100's, \$50's...give me your \$100's and \$50's, this is a robbery. Don't pull the alarm." McNulty took some money and put it on the counter. Morello then told McNulty he wanted "it all" and McNulty placed another stack of money on the counter. Morello turned to leave but reached back and took another stack of \$20's from the counter on his way out and then fled in an unknown direction. Part of McNulty's description of

the subject included a jagged dark tattoo on the right side of his neck.

6. After the August 31, 2004 bank robberies in East Boston and Chelsea and through October 19, 2004, thirteen additional banks were robbed by a lone white male whose physical appearance, according to multiple witnesses, matched the previously developed description of Morello.

7. Multiple witnesses interviewed at the bank robbery crime scenes provided descriptions of the subject which matched the known physical appearance Morello (including skin color and approximate size and shape). More specifically, many of the witnesses indicated the perpetrator of the bank robbery witnessed by him or her bore a distinctive colored tattoo on his neck. Notably, several of the robbed banks provided the task force with photographic surveillance images of the robberies. I have examined those images and found that the depicted subject bears physical characteristics consistent with the known physical characteristics of Morello which, on more than one occasion, include the aforementioned tattoo.

8. During the course of the investigations into the bank robberies, source information was received which indicated that Bernadine Maderos of Cambridge, Massachusetts was then the girlfriend of Morello. Joint investigation with the Cambridge Police revealed Maderos routinely traveled from her apartment in Cambridge, Massachusetts to South Boston every morning to receive lawful medical treatment.

9. On October 27, 2004, at approximately 8:30 a.m., Maderos was observed stopping at the medical clinic. After she left, agents observed as Maderos made stops at the U.S. Post Office in South Boston and at a Dunkin Donuts in Malden. After leaving the Dunkin Donuts, Maderos drove to the Econo Lodge on Route 60 in Malden, Massachusetts and entered the hotel. She was

observed carrying two cups of coffee into the hotel.

10. Moments later, a white male fitting the description of Morello was observed running from the hotel towards Route 60. Members of the task force identified the individual as Morello as he ran past them and they gave chase. While giving chase, members of the task force identified themselves and ordered Morello to stop running away from them. Morello was subsequently caught and placed under arrest pending the arrival of local authorities. The Malden Police arrived shortly thereafter and served Morello with the existing local warrants and transported him to the Malden Police Department.

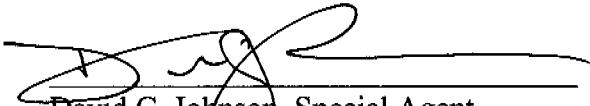
11. After being processed for the outstanding local warrants, Morello was interviewed by task force members regarding the bank robberies he was believed to have committed. Prior to questioning, Morello was advised of his Miranda warnings and signed a written waiver. He then admitted responsibility for the bank robberies at the East Boston Savings Bank on August 31, 2004, the Boston Federal Savings Bank on August 31, 2004, and the Eastern Bank on October 15, 2004, in Saugus. Morello signed the surveillance photos for each of the above three bank robberies and, by so signing, indicated that the person depicted in each photo was him. Morello also admitted to robbing a fourth bank.

12. Clearly visible on Morello's neck was a large multi-colored tattoo with jagged edges and which tattoo matched that described by witnesses at multiple robberies and which tattoo was visible in more than one of the relevant surveillance images.

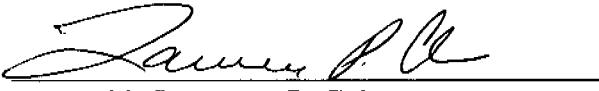
13. Based on the foregoing, I believe there is probable cause to believe that on October 15, 2004, Steven C. Morello, by force and violence, or by intimidation, took from the person and presence of employees of the Eastern Bank, 13 Main Street, Saugus, Massachusetts, money

belonging to and in the custody, control, management, and possession of the Eastern Bank, a federally-insured financial institution, in violation of 18 United States Code, Section 2113(a).

I hereby certify that the foregoing is true and correct. Executed this 2nd day of December, 2004.

  
David C. Johnson, Special Agent  
Federal Bureau of Investigation

Subscribed and Sworn to before me this 2nd day of December, 2004.

  
Honorable Lawrence P. Cohen  
UNITED STATES MAGISTRATE JUDGE

**Criminal Case Cover Sheet****U.S. District Court - District of Massachusetts**Place of Offense: Category No. II Investigating Agency FBICity Boston**Related Case Information:**County Essex

Superseding Ind./ Inf. \_\_\_\_\_ Case No. \_\_\_\_\_

Same Defendant \_\_\_\_\_ New Defendant  x \_\_\_\_\_

Magistrate Judge Case Number \_\_\_\_\_

Search Warrant Case Number \_\_\_\_\_

R 20/R 40 from District of \_\_\_\_\_

**Defendant Information:**Defendant Name STEVEN C. MORELLO Juvenile  Yes  NoAlias Name ~~SM~~ Mai - ConcordAddress Essex Co. House of CorrectionsBirth date: 1967 SS#: 8096 Sex: M Race: White Nationality: USA

Defense Counsel if known: \_\_\_\_\_ Address: \_\_\_\_\_

Bar Number: \_\_\_\_\_

**U.S. Attorney Information:**AUSA Paul R. Moore Bar Number if applicable 632312Interpreter:  Yes  No List language and/or dialect: \_\_\_\_\_Matter to be SEALED:  Yes  No Warrant Requested  Regular Process  In Custody**Location Status:**

Arrest Date: \_\_\_\_\_

 Already in Federal Custody as of \_\_\_\_\_ in \_\_\_\_\_. Already in State Custody \_\_\_\_\_  Serving Sentence  Awaiting Trial On Pretrial Release: Ordered by \_\_\_\_\_ on \_\_\_\_\_Charging Document:  Complaint  Information  IndictmentTotal # of Counts:  Petty \_\_\_\_\_  Misdemeanor \_\_\_\_\_  Felony \_\_\_\_\_

Continue on Page 2 for Entry of U.S.C. Citations

 I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: December 2, 2004 Signature of AUSA: \_\_\_\_\_

~~SJS 45 (5/97) - (Revised USAO MA 3/25/02) Page 2 of 2 or Reverse~~

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant STEVEN C. MORELLO

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	18 U.S.C. § 2113(a)	Bank Robbery	1
Set 2	_____	_____	_____
Set 3	_____	_____	_____
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____
ADDITIONAL INFORMATION: _____			

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant STEVEN C. MORELLO

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